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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

**TransMontaigne Product Services Inc.
20 Jackson Street
New Albany, Indiana 47150**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: F043-15196-00010 | |
| Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: December 20, 2002 Expiration Date: December 20, 2007 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary operation of a bulk petroleum product storage and transfer terminal.

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|-------------------------|---|
| Authorized individual: | Garrett Clemons, Environmental Analyst |
| Source Address: | 20 Jackson Street, New Albany, Indiana 47150 |
| Mailing Address: | P.O. Box 5660, Denver, Colorado 80217 |
| General Source Phone: | (812) 948-2458 |
| SIC Code: | 4226 |
| County Location: | Floyd |
| Source Location Status: | Nonattainment for ozone Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 1,050,000 gallon capacity petroleum liquid domed external floating roof (DEFR) storage tank identified as EU 1, constructed in 1963, exhausting at one emission point identified as 1.
- (b) One (1) 1,050,000 gallon capacity petroleum liquid DEFR storage tank identified as EU 2, constructed in 1963, exhausting at one emission point identified as 2.
- (c) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 3, constructed in 1963, exhausting at one emission point identified as 3.
- (d) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 4, constructed in 1963, exhausting at one emission point identified as 4.
- (e) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 5, constructed in 1963, exhausting at one emission point identified as 5.
- (f) One (1) 840,000 gallon capacity petroleum liquid internal floating roof (IFR) storage tank identified as EU 6, constructed in 1963, exhausting at one emission point identified as 6.
- (g) One (1) 378,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 7, constructed in 1949, exhausting at one emission point identified as 7.

- (h) One (1) 420,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 8, constructed in 1963, exhausting at one emission point identified as 8.
- (i) One (1) 294,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 9, constructed in 1949, exhausting at one emission point identified as 9.
- (j) One (1) 252,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 10, constructed in 1949, exhausting at one emission point identified as 10.
- (k) One (1) 197,904 gallon capacity petroleum liquid cone roof storage tank identified as EU 1C, constructed in 1949, exhausting at one emission point identified as 1C.
- (l) One (1) 210,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 5C, constructed in 1949, exhausting at one emission point identified as 5C.
- (m) One (1) 210,000gallon capacity petroleum liquid cone roof storage tank identified as EU 6C, constructed in 1949, exhausting at one emission point identified as 6C.
- (n) One (1) 200,634 gallon capacity petroleum liquid cone roof storage tank identified as EU 7C, constructed in 1949, exhausting at one emission point identified as 7C.
- (o) One (1) 420,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 8C, constructed in 1949, exhausting at one emission point identified as 8C.
- (p) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU A, constructed in 1980, exhausting at one emission point identified as A.
- (q) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU B, constructed in 1980, exhausting at one emission point identified as B.
- (r) One (1) volatile organic compounds (true vapor pressure (TVP) limited to less than 0.507 psia) storage tank:
 - (1) One (1) 546,000 gallon capacity petroleum liquid cone roof storage tank identified as EU11, constructed in 1989, exhausting at one emission point identified as 11.
- (s) Two (2) truck loading racks consisting of:
 - (1) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 22, constructed in 1963, equipped with a flame arrestor exhausting at one (1) stack identified as S/V ID 22; and
 - (2) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 26, constructed in 1949, exhausting at one emission point identified as S/V ID 26.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (1) One (1) distillate fuel (50% #2 diesel with 50% kerosene) cone roof storage tank with maximum storage capacity of 900 gallons, identified as EU 19, constructed in 1949 and exhausting at one (1) stack identified as 19.
- (b) Paved and unpaved roads and parking lots identified as EU 23.
- (c) One (1) distillate oil fired boiler identified as EU 24 rated at 2.188 MMBtu/hr, constructed in 1989 and exhausting at one (1) stack identified as 24.
- (d) Fugitive VOC emissions from pumps, valves, flanges, etc. identified as EU 25.
- (e) One (1) barge unloading wharf capable of off-loading petroleum liquids at a rate of 126,000 gallons per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on October 24, 1996. The plan is included as Attachment A.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) 1,050,000 gallon capacity petroleum liquid domed external floating roof (DEFR) storage tank identified as EU 1, constructed in 1963, exhausting at one emission point identified as 1.
- (b) One (1) 1,050,000 gallon capacity petroleum liquid DEFR storage tank identified as EU 2, constructed in 1963, exhausting at one emission point identified as 2.
- (c) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 3, constructed in 1963, exhausting at one emission point identified as 3.
- (d) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 4, constructed in 1963, exhausting at one emission point identified as 4.
- (e) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 5, constructed in 1963, exhausting at one emission point identified as 5.
- (f) One (1) 840,000 gallon capacity petroleum liquid internal floating roof (IFR) storage tank identified as EU 6, constructed in 1963, exhausting at one emission point identified as 6.
- (g) One (1) 378,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 7, constructed in 1949, exhausting at one emission point identified as 7.
- (h) One (1) 420,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 8, constructed in 1963, exhausting at one emission point identified as 8.
- (i) One (1) 294,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 9, constructed in 1949, exhausting at one emission point identified as 9.
- (j) One (1) 252,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 10, constructed in 1949, exhausting at one emission point identified as 10.
- (k) One (1) 197,904 gallon capacity petroleum liquid cone roof storage tank identified as EU 1C, constructed in 1949, exhausting at one emission point identified as 1C.
- (l) One (1) 210,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 5C, constructed in 1949, exhausting at one emission point identified as 5C.
- (m) One (1) 210,000gallon capacity petroleum liquid cone roof storage tank identified as EU 6C, constructed in 1949, exhausting at one emission point identified as 6C.
- (n) One (1) 200,634 gallon capacity petroleum liquid cone roof storage tank identified as EU 7C, constructed in 1949, exhausting at one emission point identified as 7C.
- (o) One (1) 420,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 8C, constructed in 1949, exhausting at one emission point identified as 8C.
- (p) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU A, constructed in 1980, exhausting at one emission point identified as A..
- (q) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU B, constructed in 1980, exhausting at one emission point identified as B.
- (r) One (1) volatile organic compounds (true vapor pressure (TVP) limited to less than 0.507 psia) storage tank:
 - (1) One (1) 546,000 gallon capacity petroleum liquid cone roof storage tank identified as EU11, constructed in 1989, exhausting at one emission point identified as 11.

Insignificant Activity

- (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (1) One (1) distillate fuel (50% #2 diesel with 50% kerosene) cone roof storage tank with maximum storage capacity of 900 gallons, identified as EU 19, constructed in 1949 and exhausting at one (1) stack identified as 19.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) Pursuant to 326 IAC 2-8, the total VOC emissions from the storage tanks (EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 1C, EU 5C, EU 6C, EU 7C, EU 8C, EU A and EU B) shall be limited based on the following equation:

(Losses from fixed roof tanks + Losses from floating roof tanks) < 79.08 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

Where:

Losses from fixed roof tanks = $L_S + L_W$

Losses from floating roof tanks = $L_R = L_{WD} + L_F + L_D$

L_S = Standing storage losses

L_W = Working losses

L_R = Rim seal loss

L_{WD} = Withdrawal losses

L_F = Deck fitting loss

L_D = Deck seam loss

Above losses from the storage tanks shall be calculated using US EPA's latest version of Tank software (currently Tank 4.09).

- (b) The above equation shall limit the total potential to emit of volatile organic compounds (VOC) from the storage tanks (EU 1 through EU 11, EU 1C and EU 5C through EU 8C) to 79.08 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit in conjunction with the requirements of Conditions D.2.1 (loading rack VOC emissions) shall limit source wide emissions of VOC to less than 100 tons per twelve (12) month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, and 40 CFR 52.21 do not apply.
- (c) The potential to emit hazardous air pollutants (HAPs) from the entire source (including all storage tanks and two (2) loading racks listed in Section D.2) shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month for worst case single HAP and total HAPs, respectively. Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70), 326 IAC 2-2, 40 CFR 52.21 and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations not applicable to the source

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, Tank Nos. EU 1 through EU 8 are subject to the following:

- (a) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (3) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-9-4]

The eight (8) VOC Storage tanks identified as EU 1, EU 2, EU 3, EU 4 and EU 5 with external floating roofs, and EU 6, EU 7, and EU 8 with internal floating roofs, are subject to this rule. Pursuant to this rule, the Permittee shall equip each tank with one (1) of the following:

- (a) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an internal floating roof meeting the following specifications:
 - (i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - (ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (A) A foam or liquid -filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (B) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.
 - (iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - (iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - (v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

- (vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - (vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - (viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - (ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- (b) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an external floating roof meeting the following specifications:
- (i) Each external floating roof shall be equipped with a closure device between the wall of the vessel and the roof edge. The closure device shall consist of two (2) seals, one (1) above the other. The lower seal shall be referred to as the primary seal; the upper seal shall be referred to as the secondary seal.
 - (ii) Except as provided in 326 IAC 8-9-5(c)(4), the primary seal shall completely cover the annular space between the edge of the floating roof and vessel wall and shall be either a liquid-mounted seal or a shoe seal.
 - (iii) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the vessel in a continuous fashion except as allowed in 326 IAC 8-9-5(c)(4).
 - (iv) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.
 - (v) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times, without visible gap, except when the device is in actual use.
 - (vi) Automatic bleeder vents shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - (vii) Rim vents shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents shall be gasketed.
 - (viii) Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least ninety percent (90%) of the area of the opening.
 - (ix) The roof shall be floating on the liquid at all times, for example, off the roof leg supports, except when the vessel is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

- (c) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, a closed vent system and control device meeting the following specifications:
 - (i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b).
 - (ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.
- (d) A system equivalent to those described in paragraphs a, b and c as provided in 326 IAC 8-9-4.
- (e) The testing procedures are required under 326 IAC 8-9-5. The record keeping and reporting are required under 326 IAC 8-9-6.
- (f) On or before May 1, 1996, the Permittee of each vessel with a capacity greater than or equal to thirty-nine thousand (39,000) gallons, that stores VOL with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia shall equip each vessel with a closed vent system meeting the standards of paragraph (c).

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), any change or modification, for the storage tanks (EU 9, EU 10, EU 1C and EU 5C through 8C), that would lead to an increase in true vapor pressure of the petroleum liquid, as stored, to equal to or greater than 0.75 psia at the temperature stored, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 8-9-1, before such change can occur.

D.1.5 Petroleum Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

Pursuant to 40 CFR 60.110, Subpart Kb (Volatile Organic Liquid Storage Vessels), any change or modification, for the storage tank (EU 11), that would lead to an increase in true vapor pressure of the petroleum liquid, as stored, to equal to or greater than 0.507 psia at the temperature stored, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 12, 40 CFR 60.110, before such change can occur.

Compliance Determination Requirements

D.1.6 Testing and Procedures [326 IAC 8-9-5]

The eight (8) VOC Storage tanks identified as EU 1, EU 2, EU 3, EU 4 and EU 5 with external floating roofs, and EU 6, EU 7, and EU 8 with internal floating roofs, are subject to 326 IAC 8-9-5. Pursuant to this rule, the Permittee of each storage tank shall do the following:

- (a) Except as provided in section 326 IAC 8-9-4(a)(2), the Permittee of each vessel equipped with an internal floating roof shall meet the following requirements:
 - (1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel.

- (2) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator (IDEM) in the inspection report required in 326 IAC 8-9-6(c)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
 - (3) For vessels equipped with both primary and secondary seals:
 - (i) Visually inspect the vessel as specified in paragraph (4) of this section at least every 5 years; or
 - (ii) Visually inspect the vessel as specified in paragraph (2) of this section.
 - (4) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (2) and (3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (3)(i) of this section.
 - (5) Notify the Administrator (IDEM) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a) and (d) of this section to afford the Administrator (IDEM) the opportunity to have an observer present. If the inspection required by paragraph (d) of this section is not planned and the Permittee could not have known about the inspection 30 days in advance or refilling the tank, the Permittee shall notify the Administrator (IDEM) at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator (IDEM) at least 7 days prior to the refilling.
- (b) Except as provided in 326 IAC 8-9-4(a)(3), the Permittee of each vessel equipped with an external floating roof shall meet the following requirements:
 - (1) Determine the gap areas and maximum gap widths between the primary seal and the wall of the vessel and between the secondary seal and the wall of the vessel according to the following frequency:

- (A) Measurements of gaps between the vessel wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within sixty (60) days of the initial fill with VOL and at least once every five (5) years thereafter.
 - (B) Measurements of gaps between the vessel wall and the secondary seal shall be performed within sixty (60) days of the initial fill with VOL and at least once per year thereafter.
 - (C) If any source ceases to store VOL for a period of one (1) year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for purposes of this subdivision.
- (2) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
- (A) Measure seal gaps, if any, at one (1) or more floating roof levels when the roof is floating off the roof leg supports.
 - (B) Measure seal gaps around the entire circumference of the vessel in each place where a one-eighth (1/8) inch diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the vessel and measure the circumferential distance of each such location.
 - (C) The total surface area of each gap described in clause (B) shall be determined by using probes of various widths to measure accurately the actual distance from the vessel wall to the seal and multiplying each such width by its respective circumferential distance.
- (3) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each by the nominal diameter of the vessel and compare each ratio to the respective standards in subdivision (4).
- (4) Make necessary repairs or empty the vessel within forty-five (45) days of identification of seals not meeting the requirements listed in clauses (A) and (B) as follows:
- (A) The accumulated area of gaps between the vessel wall and the mechanical shoe or liquid-mounted primary seal shall not exceed ten (10) square inches per foot of vessel diameter, and the width of any portion of any gap shall not exceed one and five-tenths (1.5) inches. There shall be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
 - (B) The secondary seal shall meet the following requirements:
 - (i) The secondary seal shall be installed above the primary seal so that it completely covers the space between the roof edge and the vessel wall except as provided in subdivision (2)(C).
 - (ii) The accumulated area of gaps between the vessel wall and the secondary seal used in combination with a metallic shoe or liquid-mounted primary seal shall not exceed one (1) square inch per foot of vessel diameter, and the width of any portion of any gap shall not exceed five-tenths (0.5) inch. There shall be no gaps between the vessel wall and the secondary seal when used in combination with a vapor-mounted primary seal.
 - (iii) There shall be no holes, tears, or other openings in the seal or seal fabric.

- (C) If a failure that is detected during inspections required in subdivision (1) cannot be repaired within forty-five (45) days and if the vessel cannot be emptied within forty-five (45) days, a thirty (30) day extension may be requested from the department in the inspection report required in 326 IAC 8-9-6(d)(3). Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (5) Notify the department thirty (30) days in advance of any gap measurements required by subdivision (1) to afford the department the opportunity to have an observer present.
- (6) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. For all visual inspections, the following requirements apply:
 - (A) If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this clause exist before filling or refilling the vessel with VOL.
 - (B) The Permittee shall notify the department in writing at least thirty (30) days prior to the filling or refilling of each vessel to afford the department the opportunity to inspect the vessel prior to the filling. If the inspection required by this subdivision is not planned and the Permittee could not have known about the inspection thirty (30) days in advance of refilling the vessel, the Permittee shall notify the department at least seven (7) days prior to the refilling of the vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the department at least seven (7) days prior to the refilling.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (10) below. Records maintained for (1) through (10) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The throughput of VOC products through each tank for each month.
 - (2) The total throughput of VOC products through all tanks per month.
 - (3) The 12 month rolling total throughputs of VOC products through all tanks.
 - (4) The types of volatile organic compounds stored.
 - (5) The actual and maximum true vapor pressure of the liquid as stored.

- (6) The saturation factor, molecular weight, and temperature of the liquid as stored.
 - (7) The HAP content of each VOC product received or stored.
 - (8) The dates of the VOC products storage.
 - (9) Total VOC emissions calculated based on equation in Condition D.1.1(a).
 - (10) Single HAP and combined HAPs emissions determined based on total VOC emissions.
- (b) Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), storage tank identified as EU 11 is subject to following record keeping requirements.

The Permittee shall maintain permanent records at the source in accordance with (1) through (3) below:

- (1) the dimension of the storage vessel;
 - (2) an analysis showing the capacity of the storage vessel; and
 - (3) vapor pressure of organic liquid stored in tank EU 11.
- (c) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), storage tanks identified as EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 1C, EU 5C, EU 6C, EU 7C, EU 8C, EU A EU B and EU 19 are subject to the following record keeping requirements.
- (1) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (2) below, for at least two (2) years. The record required by paragraph (2) below will be kept for the life of the source.
 - (2) The Permittee shall keep readily accessible records showing the dimension of each storage vessel, identification number and an analysis showing the capacity of each storage vessel.
 - (3) Except as provided in 326 IAC 8-9-6(f) and (g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure greater than or equal to five-tenths (0.5) pound per square inch absolute (psia) but less than seventy-five hundredths (0.75) psia shall maintain a record of the maximum true vapor pressure of the VOL, a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
 - (4) Except as provided in paragraph 326 IAC 8-9-6(g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall maintain a record and notify the Administrator (IDEM) within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Record Keeping Requirements [326 IAC 8-9-6]

The Permittee shall comply with the record keeping requirements in 326 IAC 8-9-6 (for the EU 1, EU 2, EU 3, EU 4 and EU 5 with external floating roofs, and EU 6, EU 7, and EU 8 with internal floating roofs), and shall maintain the following records for a minimum of three (3) years.

- (a) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the internal floating roof gasoline storage tanks identified as EU 6, EU 7, and EU 8 shall keep copies of all reports and records for at least three (3) years. The Permittee of the internal floating roof tanks shall meet the following requirements:
 - (1) Keep a record of each inspection performed as required by 326 IAC 8-9-5(b)(1) through 326 IAC 8-9-5(b)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
 - (2) If any of the conditions described in 326 IAC 8-9-5(b)(2) are detected during the annual visual inspection, a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - (3) After each inspection required by 326 IAC 8-9-5(b)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 326 IAC 8-9-5(b)(3)(B), a record shall be maintained and a report shall be furnished to the department within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 326 IAC 8-9-4(a)(1)(A), 326 IAC 8-9-4(a)(2)(A), or 326 IAC 8-9-5(b), and list each repair made.
- (b) Pursuant to Condition D.1.3 and 326 IAC 8-9-6, the Permittee of the external floating roof gasoline storage tanks identified as EU 1, EU 2, EU 3, EU 4 and EU 5 shall keep copies of all reports and records for at least three (3) years. The Permittee of the external floating roof tanks shall meet the following requirements:
 - (1) Keep a record of each gap measurement performed as required by 326 IAC 8-9-5(c). Each record shall identify the vessel in which the measurement was made and shall contain the date of measurement, the raw data obtained in the measurement and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3):
 - (2) Within sixty (60) days of performing the seal gap measurements required by 326 IAC 8-9-5(c)(1), furnish the department with a report that contains the date of measurement, the raw data obtained in the measurement, and the calculations described in 326 IAC 8-9-5(c)(2) and (c)(3).
 - (3) After each seal gap measurement that detects gaps exceeding the limitations specified in 326 IAC 8-9-5(c), submit a report to the department within thirty (30) days of the inspection. The report shall identify the vessel and contain the information specified in subdivision (2) and the date the vessel was emptied or the repairs made and date of repair.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (s) Two (2) truck loading racks consisting of:
 - (1) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 22, constructed in 1963, equipped with a flame arrestor and exhausting at one (1) stack identified as S/V ID 22; and
 - (2) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 26, constructed in 1949, exhausting at one emission point identified as S/V ID 26.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) Pursuant to 326 IAC 2-8, the actual vapor pressure, actual throughputs, actual molecular weight, actual temperature and actual saturation factor of the organic liquids stored and loaded through two (2) tank truck loading racks (EU 22 and EU 26) shall be limited based on the following equation:

$$\sum_{i=1}^n \{ [12.46 \times S_i \times MW_i \times VP_i] \times \left[\frac{T_i}{2000} \right] \} \leq 19.56 \text{ tons VOC per twelve (12)}$$

consecutive month period with compliance determined at the end of each month.

Where:

- i = Storage tank
- S_i = The saturation factor of the liquid in each storage tank (i) for each month
- MW_i = The molecular weight of the liquid in each storage tank (i) for each month
- VP_i = The vapor pressure of the liquid
- F_i = The temperature of the liquid in each storage tank (i) for each month
- T_i = The throughput for each storage tank (i) for each month

- (b) Compliance with the VOC emission limit determined by the equation in (a) shall limit the total potential to emit of volatile organic compounds (VOC) from the two (2) loading racks (EU 22 and EU 26) to 19.56 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit in conjunction with the requirements of Conditions D.1.1 (storage tanks VOC emissions) shall limit source wide emissions of VOC to less than 100 tons per twelve (12) month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7, 326 IAC 2-2, and 40 CFR 52.21 do not apply.
- (c) Compliance with the VOC emission limit in (a) shall also limit the potential to emit hazardous air pollutants (HAPs) from the entire source (including all storage tanks listed in Section D.1 and the two (2) loading racks) to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month for worst case single HAP and total HAPs, respectively. Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70), 326 IAC 2-2, 40 CFR 52.21 and 40 CFR Part 63.420, and Subpart R, National Emission Standards for Gasoline Terminals and Pipeline Breakout Stations not applicable to the source

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC emission limits established in Condition D.2.1.
- (1) The amount of each product loaded for each month.
 - (2) The twelve (12) month rolling total of products loaded.
 - (3) The type of VOC products loaded.
 - (4) The maximum true vapor pressure of VOC products as loaded.
 - (5) The HAP content of each VOC product loaded.
 - (6) Total VOC emissions calculated based on equation in Condition D.2.1(a).
 - (7) Single HAP and combined HAPs emissions determined based on total VOC emissions.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activity)

- (a) One (1) distillate oil fired boiler identified as EU 24 rated at 2.188 MMBtu/hr, constructed in 1989 and exhausting at one 91) stack identified as 24.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the Particulate emissions from the one (1) boiler identified as EU 24, rated at 2.188 MMBtu/hr, shall be limited to 0.6 pounds per MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: TransMontaigne Product Services Inc.
Source Address: 20 Jackson Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 5660, Denver, Colorado 80217
FESOP No.: F043-15196-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: TransMontaigne Product Services Inc.
Source Address: 20 Jackson Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 5660, Denver, Colorado 80217
FESOP No.: F043-15196-00010

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
cThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
cThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: TransMontaigne Product Services Inc.
Source Address: 20 Jackson Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 5660, Denver, Colorado 80217
FESOP No.: F043-15196-00010
Facility: VOC Storage Tanks (EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 1C, EU 5C, EU 6C, EU 7C, EU 8C, EU A and EU B)
Parameter: VOC emissions
Limit: 79.08 tons per twelve (12) consecutive month period with compliance determined at the end of each month as specified in the following equation.:

(Losses from fixed roof tanks + Losses from floating roof tanks) < 79.08 tons VOC per twelve (12) consecutive month period with compliance being determined at the end of each month

Where:

Losses from fixed roof tanks = $L_S + L_W$

Losses from floating roof tanks = $L_R = L_{WD} + L_F + L_D$

L_S = Standing storage losses

L_W = Working losses

L_R = Rim seal loss

L_{WD} = Withdrawal losses

L_F = Deck fitting loss

L_D = Deck seam loss

Above losses from the storage tanks shall be calculated using US EPA's latest version of Tank software (currently Tank 4.09).

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|--------------------------|--------------------------------------|------------------------------|
| | VOC Emissions This Month | VOC Emissions for Previous 11 Months | VOC Emissions 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: TransMontaigne Product Services Inc.
 Source Address: 20 Jackson Street, New Albany, Indiana 47150
 Mailing Address: P.O. Box 5660, Denver, Colorado 80217
 FESOP No.: F043-15196-00010
 Facility: Two (2) loading racks (EU 22 and EU 26)
 Parameter: VOC emissions
 Limit: 19.56 tons per twelve (12) consecutive month period with compliance determined at the end of each month as specified in the following equation:

$$\sum_{i=1}^n \left\{ \left[12.46 \times S_i \times MW_i \times VP_i \right] \times \left[\frac{T_i}{2000} \right] \right\} \leq 19.56 \text{ tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.}$$

Where:

i = Storage tank
 S_i = The saturation factor of the liquid in each storage tank (i) for each month
 MW_i = The molecular weight of the liquid in each storage tank (i) for each month
 VP_i = The vapor pressure of the liquid
 T_i = The temperature of the liquid in each storage tank (i) for each month
 F_i = The throughput for each storage tank (i) for each month

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|---------------------------------|---|-------------------------------------|
| | VOC Emissions This Month (tons) | VOC Emissions for Previous 11 Months (tons) | VOC Emissions 12 Month Total (tons) |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015**

FESOP Quarterly Report

Source Name: TransMontaigne Product Services Inc.
Source Address: 20 Jackson Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 5660, Denver, Colorado 80217
FESOP No.: F043-15196-00010
Facilities: Source wide HAPs emissions (Storage tanks: (EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 1C, EU 5C, EU 6C, EU 7C, EU 8C, EU A and EU B; Loading racks: EU 22 and EU 26)
Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
Limits: Source wide emissions of worst case single HAP and combination of HAPs shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | This Month (tons) | | Previous 11 Months (tons) | | 12 Months (tons) | |
|---------|-------------------|---------------|---------------------------|---------------|------------------|---------------|
| | Single HAP | Combined HAPs | Single HAP | Combined HAPs | Single HAP | Combined HAPs |
| Month 1 | | | | | | |
| Month 2 | | | | | | |
| Month 3 | | | | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: TransMontaigne Product Services Inc.
Source Address: 20 Jackson Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 5660, Denver, Colorado 80217
FESOP No.: F043-15196-00010

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

| | |
|------------------------------|--|
| Source Name: | TransMontaigne Product Services, Inc. |
| Source Location: | 20 Jackson Street, New Albany, Indiana 47150 |
| SIC Code: | 4226 |
| County: | Floyd |
| Operation Permit No.: | F123-15136-00007 |
| Permit Reviewer: | Adeel Yousuf /EVP |

On October 17, 2002, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune, New Albany, Indiana, stating that TransMontaigne Product Services, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a bulk petroleum product storage and transfer terminal. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On October 18, 2002, Garrett Clemons of TransMontaigne Product Services, Inc. submitted a comment on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Tank EU 1 and EU 2 are both Domed External Floating Roof (DEFR) tanks, in the Draft they are referred to as EFR's.

Response 1

The following changes have been made in sections A.2 and D.1 as a result of this comment.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 1,050,000 gallon capacity petroleum liquid **domed** external floating roof (**DEFR**) storage tank identified as EU 1, constructed in 1963, exhausting at one emission point identified as 1.
- (b) One (1) 1,050,000 gallon capacity petroleum liquid **DEFR** storage tank identified as EU 2, constructed in 1963, exhausting at one emission point identified as 2.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) 1,050,000 gallon capacity petroleum liquid **domed** external floating roof (DEFR) storage tank identified as EU 1, constructed in 1963, exhausting at one emission point identified as 1.
- (b) One (1) 1,050,000 gallon capacity petroleum liquid **DEFR** storage tank identified as EU 2, constructed in 1963, exhausting at one emission point identified as 2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. A general source phone number has been added to the permit. "County Status" has been deleted; it was not removed previously when replaced by "Source Location Status" in order to clarify when only portions of a county are non-attainment.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary operation of a bulk petroleum product storage and transfer terminal.

| | |
|--|--|
| Authorized individual: | Garrett Clemons, Environmental Analyst |
| Source Address: | 20 Jackson Street, New Albany, Indiana 47150 |
| Mailing Address: | P.O. Box 5660, Denver, Colorado 80217 |
| General Source Phone: | (812) 948-2458 |
| SIC Code: | 4226 |
| County Source Location Status : | Floyd |
| County Status: | |
| Source Location Status: | Nonattainment for ozone Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act |

2. The general provisions; term of permit rule cite was added to B.3 Permit Term. In order to avoid confusion for renewals as to what "original" date IDEM is referring to, the following change has been made:

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

3. Since B.8 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity. Also, the condition was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
[326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]~~
- (c) **For information furnished by the Permittee to IDEM, OAQ,** the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

4. The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.14. The statement at the end of Emergency Provisions B.14(b)(4) has been removed, because this is stated again in (f).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

~~Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

- 5. (c) has been removed from B.15 Deviations from Permit Requirements and Conditions, then revised and incorporated in B.14 Emergency Provisions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- ~~(c) — Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

- 6. B.18 Permit Amendment or Revision has been revised to replace "should" with "shall" in (b).

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

7. In order to be consistent with 326 IAC 2-8-15(a)(5) the rule cite has been revised in B.19(a)(5) B.19 Operational Flexibility. (b) has been removed, because this is a Part 70 requirement, but not a FESOP requirement.

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

~~_____ (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

~~_____ (1) A brief description of the change within the source;~~

~~_____ (2) The date on which the change will occur;~~

~~_____ (3) Any change in emissions; and~~

~~_____ (4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~_____ The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.~~

- (eb) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (~~dc~~) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

8. B.22 (c)Transfer of Ownership or Operational Control rule cite has been corrected.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-44 ~~10~~(b)(3)]

9. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to B.23. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4320** (ask for ~~OAQ, Technical Support and Modeling Section~~ **I/M & Billing Section**), to determine the appropriate permit fee.

10. C.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour has been revised as follows.

~~C.2 Particulate Emission Limitations For Manufacturing Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(e)]~~

~~Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any manufacturing process not exempt by 326 IAC 6-3-1 or already regulated by 326 IAC 6-3-2(b) through (d), and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.~~

C.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

11. C.9(e) Asbestos Abatement Projects has been revised to correct the rule cite.

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

12. The following was added to C.11 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements.

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

13. C.20 (d) General Reporting Requirements has been revised to indicate all forms instead of the choice between quarterly or semi-annual.
- (d) Unless otherwise specified in this permit, ~~any quarterly~~ **all reports** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The report do~~ **All reports do** require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
14. D.3.1 Particulate was revised to remove “Matter” and “PM” from this condition, because 326 IAC 6-2 is for Particulate Emissions not Particulate Matter Emissions.
- D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]
- Pursuant to 326 IAC 6-2-4(a) (Particulate ~~Matter~~ Emission Limitations for Sources of Indirect Heating), the **PM Particulate** emissions from the one (1) boiler identified as EU 24, rated at 2.188 MMBtu/hr, shall be limited to 0.6 pounds per MMBtu heat input.
15. The first sentence of the Quarterly Deviation and Compliance Monitoring Report is being removed, because it poses a conflict with the provisions that require an annual certification.

Quarterly Deviation and CM Report

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”.

16. The first box on the Emergency Occurrence Report form was revised to include the word “working” in order to be consistent with 326 IAC 2-8-12(b)(5) and the Emergency Provision.

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two **(2) working** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: TransMontaigne Product Services, Inc.
Source Location: 20 Jackson Street, New Albany, Indiana 47150
County: Floyd
SIC Code: 4226
Operation Permit No.: F043-15196-00010
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from TransMontaigne Product Services, Inc. relating to the operation of the operation of a bulk petroleum product storage and transfer terminal. TransMontaigne Product Services, Inc. was issued FESOP 043-5645-00010 on December 13, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) 1,050,000 gallon capacity petroleum liquid external floating roof (EFR) storage tank identified as EU 1, constructed in 1963, exhausting at one emission point identified as 1.
- (b) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 2, constructed in 1963, exhausting at one emission point identified as 2.
- (c) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 3, constructed in 1963, exhausting at one emission point identified as 3.
- (d) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 4, constructed in 1963, exhausting at one emission point identified as 4.
- (e) One (1) 1,050,000 gallon capacity petroleum liquid EFR storage tank identified as EU 5, constructed in 1963, exhausting at one emission point identified as 5.
- (f) One (1) 840,000 gallon capacity petroleum liquid internal floating roof (IFR) storage tank identified as EU 6, constructed in 1963, exhausting at one emission point identified as 6.
- (g) One (1) 378,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 7, constructed in 1949, exhausting at one emission point identified as 7.
- (h) One (1) 420,000 gallon capacity petroleum liquid (IFR) storage tank identified as EU 8, constructed in 1963, exhausting at one emission point identified as 8.

- (i) One (1) 294,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 9, constructed in 1949, exhausting at one emission point identified as 9.
- (j) One (1) 252,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 10, constructed in 1949, exhausting at one emission point identified as 10.
- (k) One (1) 197,904 gallon capacity petroleum liquid cone roof storage tank identified as EU 1C, constructed in 1949, exhausting at one emission point identified as 1C.
- (l) One (1) 210,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 5C, constructed in 1949, exhausting at one emission point identified as 5C.
- (m) One (1) 210,000gallon capacity petroleum liquid cone roof storage tank identified as EU 6C, constructed in 1949, exhausting at one emission point identified as 6C.
- (n) One (1) 200,634 gallon capacity petroleum liquid cone roof storage tank identified as EU 7C, constructed in 1949, exhausting at one emission point identified as 7C.
- (o) One (1) 420,000 gallon capacity petroleum liquid cone roof storage tank identified as EU 8C, constructed in 1949, exhausting at one emission point identified as 8C.
- (p) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU A, constructed in 1980, exhausting at one emission point identified as A.
- (q) One (1) 30,000 gallon capacity petroleum liquid cone roof storage tank identified as EU B, constructed in 1980, exhausting at one emission point identified as B.
- (r) One (1) volatile organic compounds (true vapor pressure (TVP) limited to less than 0.507 psia) storage tank:
 - (1) One (1) 546,000 gallon capacity petroleum liquid cone roof storage tank identified as EU11, constructed in 1989, exhausting at one emission point identified as 11.
- (s) Two (2) truck loading racks consisting of:
 - (1) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 22, constructed in 1963, equipped with a flame arrestor and exhausting at one (1) stack identified as S/V ID 22; and
 - (2) one (1) tank truck loading rack capable of top/bottom loading petroleum liquids identified as EU 26, constructed in 1949, exhausting at one emission point identified as S/V ID 26.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (1) One (1) distillate fuel (50% #2 diesel with 50% kerosene) cone roof storage tank with maximum storage capacity of 900 gallons, identified as EU 19, constructed in 1949 and exhausting at one (1) stack identified as 19.

- (b) Paved and unpaved roads and parking lots identified as EU 23.
- (c) One (1) distillate oil fired boiler identified as EU 24 rated at 2.188 MMBtu/hr, constructed in 1989 and exhausting at one (1) stack identified as 24.
- (d) Fugitive VOC emissions from pumps, valves, flanges, etc. identified as EU 25.
- (e) One (1) barge unloading wharf capable of off-loading petroleum liquids at a rate of 126,000 gallons per hour.

Existing Approvals

The source has been operating under the following previous approvals:

- (a) FESOP 043-5645-00010, issued on December 13, 1996; and expired on December 13, 2001.
- (b) First Significant Permit Modification SMF 043-8422-00010, issued on March 24, 1998.
- (b) First Administrative Amendment 043-10068-00010, issued on April 14, 2000.
- (c) Second Administrative Amendment 043-15045-00010, issued on October 25, 2001.

All terms and conditions of previous permit issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on January 8, 2002. Additional information was received on August 2, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 7).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

| Pollutant | Unrestricted Potential Emissions (tons/yr) |
|-----------------|---|
| PM | 3.70 |
| PM-10 | 1.07 |
| SO ₂ | 2.72 |
| VOC | 1851.40 |
| CO | 0.34 |
| NO _x | 1.37 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Unrestricted Potential Emissions (tons/yr) |
|---------------|---|
| Benzene | less than 10 |
| Toluene | greater than 10 |
| Xylene | greater than 10 |
| Ethyl Benzene | less than 10 |
| Cumene | less than 10 |
| Hexane | greater than 10 |
| TOTAL | greater than 25 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 13, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F043-5645-00010; issued on December 13, 1996).

| | Potential to Emit After Issuance (tons/year) | | | | | | |
|---------------------------------|---|-------|-----------------|-------|------|-----------------|-------------------------------|
| Process/emission unit | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAP |
| Storage Tanks | -- | -- | -- | 79.08 | -- | -- | (1) |
| Loading Racks (EU 22 and EU 26) | -- | -- | -- | 19.56 | -- | -- | (1) |
| Insignificant Activities | 3.70 | 1.07 | 2.72 | 0.21 | 0.34 | 1.37 | negl. |
| Total PTE After Issuance | 3.70 | 1.07 | 2.72 | 98.85 | 0.34 | 1.37 | < 10 (single) < 25 (total) |

(1) Single HAP and total HAPs emissions from the storage tanks and loading racks combined are limited to less than 10 and 25 tons per year, respectively.

County Attainment Status

The source is located in Floyd County.

| Pollutant | Status |
|-----------------|------------------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | moderate nonattainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Floyd County has been designated as moderate nonattainment for ozone.

Note: IDEM, OAQ adopted the ruling on "Redesignation of Clark and Floyd Counties to attainment of the one hour ozone standard" as final in August, 2002 and is waiting on administration period of approximately 60 days before issuing the final document.

Federal Rule Applicability

There are no new federal rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 043-5645-00010; issued on December 13, 1996.

- (a) Storage tanks identified as EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, 1C, 5C, 6C, 7C, 8C are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, 110a-115a or 110b-117b, Subparts K, Ka and Kb), because these tanks were all constructed between 1949 and 1963, prior to the earliest applicability date of June 11, 1973 for Subpart K, Ka or Kb.
- (b) Storage tanks identified as EU A, EU B and EU 19 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110a, Subpart Ka), because each tank constructed in 1980, 1980 and 1949, respectively, has a storage capacity less than 40,000 gallons.
- (c) Storage tank identified as EU 11 (constructed in 1989) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb) where construction, reconstruction, or modification commenced after July 23, 1984. This tank has storage capacity of greater than 151 cubic meters (m³) (39,889 gallons) and store only volatile organic compounds with a maximum true vapor pressure less than 3.5 kPa. Therefore, pursuant to 40 CFR 60.110b(c), this tank is exempt from all other provisions of this Subpart except 60.116b, which requires that permanent records be maintained showing dimensions and an analysis of the capacities of each tank.
- (d) The one (1) distillate oil fired boiler, (ID No. EU24, rated at 2.188 MMBtu/hr), is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the boiler is less than ten (10) million Btu per hour (MMBtu/hr).
- (e) The two (2) loading racks at this source, identified as EU 22 and EU 26 are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.500, Subpart XX) "Standards of Performance for Bulk Gasoline Terminals" since the source does not load gasoline and therefore is not a bulk gasoline terminal. Therefore, the provisions of this Subpart do not apply.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.420, Subpart R), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.

State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 043-5645-00010; issued on December 13, 1996.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Floyd county and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-2 and 40 CFR 52.21(Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of this rule. This source was constructed in 1949, prior to the rule applicability date of August 7, 1980, is not one of the 28 listed source categories and no major modifications were done, therefore, it is not subject to the requirements of the rule. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5, for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source which has not received all the necessary preconstruction approvals before December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. Fugitive emissions from the plant roadways will be watered on an as needed basis.

State Rule Applicability - Individual Facilities

Rule 326 IAC 8-9 is determined to be applicable to the storage vessels (ID Nos. EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, and EU 8) at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP 043-5645-00010, issued August 8, 1997 and this FESOP renewal 043-15196-00010.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source wide potential to emit of VOC shall be limited to less than 100 tons per twelve (12) consecutive month period and the source wide potential to emit single HAP and total HAP emissions shall be limited to less than 10 and 25 tons per 12 consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7, do not apply. In order to comply with these limits following conditions apply:

- (1) The total VOC emissions from the storage tanks (EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, EU 8, EU 9, EU 10, EU 11, EU 1C, EU 5C, EU 6C, EU 7C, EU 8C, EU A, EU B and EU 19) shall be limited based on the following equation to limit the potential to emit VOC to no greater than 79.08 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(Losses from fixed roof tanks + Losses from floating roof tanks) < 79.08 tons per twelve (12) consecutive month period with compliance determined at the end of each month

Where:

Losses from fixed roof tanks = $L_S + L_W$

Losses from floating roof tanks = $L_R = L_{WD} + L_F + L_D$

L_S = Standing storage losses

L_W = Working losses

L_R = Rim seal loss

L_{WD} = Withdrawal losses

L_F = Deck fitting loss

L_D = Deck seam loss

Above losses from the storage tanks shall be calculated using US EPA's latest version of Tank software (currently Tank 4.09).

- (2) The actual vapor pressure, actual throughputs, actual molecular weight, actual temperature and actual saturation factor of the organic liquids stored and loaded through all tank truck loading racks shall be limited based on the following equation to limit the potential to emit (PTE) volatile organic compounds (VOC) to no greater than 19.56 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$\sum_{i=1}^n \{ [12.46 \times S_i \times MW_i \times VP_i] \times \left[\frac{T_i}{2000} \right] \} \leq 19.56 \text{ tons VOC per twelve (12)}$$

consecutive month period with compliance determined at the end of each month.

Where:

i = Storage tank

S_i = The saturation factor of the liquid in each storage tank (i) for each month

MW_i = The molecular weight of the liquid in each storage tank (i) for each month

VP_i = The vapor pressure of the liquid

F_i = The temperature of the liquid in each storage tank (i) for each month

T_i = The throughput for each storage tank (i) for each month

Compliance with above conditions will limit the source-wide VOC, single HAP, and total HAPs emissions to less than 100, 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This bulk petroleum product storage and transfer terminal is not subject to the provision of 326 IAC 8-1-6. This rule applies to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential emissions of 25 tons/yr or greater. Two loading racks (EU 22 and EU 26) with potential VOC emissions greater than 25 tons/yr at this facility were constructed prior to January 1, 1980, and therefore, this rule does not apply.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) distillate oil fired boiler (ID No. EU 24 constructed in 1989), with a heat input capacity rating of 2.188 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 2.188 MMBtu/hr

$$Pt = 1.09/2.188^{0.26} = 0.89 \text{ lbs PM/MMBtu}$$

However, per 326 IAC 6-2-4(a), Pt shall not exceed 0.6 lbs PM/MMBtu for Q less than 10 MMBtu/hr, therefore the one (1) boiler (ID No. EU 24) is limited to 0.6 lbs PM/MMBtu.

compliance calculation:

Potential PM emissions after control = 0.14 tons/yr (see Appendix A: Emission Calculations)
= (0.14 tons PM/yr) * (2000 lb/ton) * (1 yr/8760 hours) * (1hour/2.188 MMBtu)
= 0.015 lbs PM/MMBtu

Potential PM emissions for B-1 (0.015 lbs PM/MMBtu) are less than allowable 0.6 lbs PM/MMBtu, therefore the one (1) boiler (ID No. EU 24) will comply with the requirements of 326 IAC 6-2-4.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

One (1) distillate oil fired boiler (ID No. EU 24) is not subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because it has potential to emit of SO₂ less than 25 tons per year.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Petroleum liquid storage tanks EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, and EU 8 each with a capacity greater than 39,000 gallons containing volatile organic liquid whose true vapor pressure is greater than 1.52 pounds per square inch (psi) are subject to the requirements of 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities). All other storage tanks at the source are not subject to the requirements of 326 IAC 8-4-3. Storage tanks Nos. EU 9, EU 10, EU 11, EU 1C, EU 5C, EU 6C, EU 7C, and EU 8C, each store petroleum liquid whose true vapor pressure is less than 1.52 psi and therefore, not subject to the rule. Storage tank Nos. EU A, EU B and EU 19, each has a capacity less than 39,000 gallons, therefore the rule does not apply.

Pursuant to 326 IAC 8-4-3, Tanks EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, and EU 8 are subject to the following:

- (a) The facility must be retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (3) rim vents, if provided are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Additionally, pursuant to 326 IAC 8-4-3, the Permittee shall maintain records including the following:

- (a) the types of volatile petroleum liquids stored;
- (b) the maximum true vapor pressure; and
- (c) records of the inspections.

Tanks EU 1, EU 2, EU 3, EU 4, and EU 5, each with external floating roof and tanks EU 6, EU 7, and EU 8, each with internal floating roof, are in compliance with this rule.

326 IAC 8-4-4 (Bulk Gasoline Terminal)

This source is not subject to the requirements of this rule because the source does not load any gasoline and is therefore, not a bulk gasoline terminal.

326 IAC 8-4-5 (Bulk Gasoline Plants)

The source is not subject to the requirements of 326 IAC 8-4-5 (Bulk Gasoline Plants) since the source does not meet the definition of a bulk gasoline plant, which requires a daily gasoline throughput of less than 20,000 gallons per day.

326 IAC 8-4-6 (Petroleum Sources - Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-1, the source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) since the source has not installed any gasoline storage tanks after July 1, 1989. Therefore, the requirements of this rule do not apply.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)

Pursuant to 326 IAC 8-4-9, sources subject to the requirements of 326 IAC 8-4-4 through 326 IAC 8-4-6 are also subject to the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems). Since the source is not subject to these rules, the requirements of this rule do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the requirements of this rule apply to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source has limited VOC emissions to less than 100 tons per year, therefore, this rule does not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in Floyd County. The source has limited potential to emit VOC to less than 100 tons per year. Therefore, this rule does not apply.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirements of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. Stationary vessels with capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch absolute (psia), but less than 0.75 psia, are only subject to 326 IAC 8-9-6(a),(b),(g), and (h).

- (a) Storage tanks identified as EU 9, EU 10, EU 1C, EU 5C, EU 6C, EU 7C, and EU 8C have capacities equal to or greater than 39,000 gallons storing a VOL with a maximum true vapor pressure equal to or greater than 0.5 pounds per square inch (psia), but less than 0.75 psia. Therefore, pursuant to 326 IAC 8-9-1, these tanks are only subject to 326 IAC 8-9-6(a), (b), (g), and (h).
- (b) Storage tank identified as EU 11 is not subject to the requirements of this rule because it is subject to subject to 40 CFR 60, Subpart Kb, (New Source Performance Standard for Volatile Organic Liquid Storage).
- (c) Storage tanks identified as EU A, EU B and EU 19 are only subject to the reporting and record keeping requirements of this rule. While the listed tanks contain volatile organic compounds, they have storage capacities less than 39,000 gallons.
- (d) Storage tanks identified as (EU 1, EU 2, EU 3, EU 4 and EU 5 with external floating roofs, and EU 6, EU 7, and EU 8 with internal floating roofs), with capacity greater than 39,000 gallons, are subject to the requirements of this rule because the listed tanks contain petroleum liquids with vapor pressure of greater than 0.75 psia.

Pursuant to this rule, the Permittee shall equip each tank with one (1) of the following:

- (a) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an internal floating roof meeting the following specifications:
 - (i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - (ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (A) A foam or liquid -filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid mounted seal means a foam - or liquid filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (B) Two seals mounted one above the others so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor mounted, but both must be continuous.
 - (iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - (iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
 - (v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - (vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
 - (vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

- (viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
 - (ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- (b) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, an external floating roof meeting the following specifications:
 - (i) Each external floating roof shall be equipped with a closure device between the wall of the vessel and the roof edge. The closure device shall consist of two (2) seals, one (1) above the other. The lower seal shall be referred to as the primary seal; the upper seal shall be referred to as the secondary seal.
 - (ii) Except as provided in 326 IAC 8-9-5(c)(4), the primary seal shall completely cover the annular space between the edge of the floating roof and vessel wall and shall be either a liquid-mounted seal or a shoe seal.
 - (iii) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the vessel in a continuous fashion except as allowed in 326 IAC 8-9-5(c)(4).
 - (iv) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.
 - (v) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times, without visible gap, except when the device is in actual use.
 - (vi) Automatic bleeder vents shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
 - (vii) Rim vents shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents shall be gasketed.
 - (viii) Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least ninety percent (90%) of the area of the opening.
 - (ix) The roof shall be floating on the liquid at all times, for example, off the roof leg supports, except when the vessel is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

- (c) At the time of the next scheduled cleaning, but not later than ten (10) years after May 1, 1996, a closed vent system and control device meeting the following specifications:
 - (i) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, 40 CFR 60.485(b).
 - (ii) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (40 CFR 60.18) of the General Provisions.
- (d) A system equivalent to those described in paragraphs a, b and c as provided in 326 IAC 8-9-4.
- (e) The testing procedures are required under 326 IAC 8-9-5. The record keeping and reporting are required under 326 IAC 8-9-6.
- (f) On or before May 1, 1996, the Permittee of each vessel with a capacity greater than or equal to thirty-nine thousand (39,000) gallons, that stores VOL with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia shall equip each vessel with a closed vent system meeting the standards of paragraph (c).

All storage tanks at the source, which are subject to the requirements of 326 IAC 8-9-4 (including tanks EU 1, EU 2, EU 3, EU 4, EU 5, EU 6, EU 7, and EU 8), are equipped with internal and external floating roof with primary and secondary seals. The source shall not store a VOL in these tanks with a maximum true vapor pressure greater than or equal to eleven and one-tenth (11.1) psia. Therefore, the source complies with the requirements of 326 IAC 8-9-4.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time

period.

The following compliance requirements for loading rack EU 22 from previous approval was not incorporated into this FESOP.

D.2.3 Daily Visible Checks for Liquid Leaks

Daily checks for leaks during loading or unloading operations of the truck loading rack (EU 22), the vapor collection system and the flame arrestor unit shall be performed during normal daylight operations when the facility is in operation. A trained employee shall record any visible leaks and the date of such leaks. Normal emissions are emissions occurring, not including startup or shutdown, when all equipment is operating satisfactorily. Abnormal emissions are those where visible liquid leaks are noticeable to a person familiar with the normal emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions.

Reason not incorporated:

Condition D.2.3 which contains compliance monitoring requirements for the truck loading rack (EU 22) is not valid because there is no control device for this loading rack and the actual emissions are less than 25 tons per year. Flame arrestor is not a flare type unit to control VOC emissions but it protects the loading rack from lightning. Total combined VOC emissions from the two loading rack are limited to 19.56 tons per year based on loading throughput equation (see discussion above).

There are no other compliance requirements applicable to this source.

Conclusion

The operation of this petroleum products distribution source shall be subject to the conditions of the attached proposed FESOP No.: F043-15196-00010.

Appendix A: Emission Calculations

Company Name: Transmontaigne Terminaling, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
FESOP: F043-15196-00010
Reviewer: Adeel Yousuf / EVP
Date: August 6, 2002

| Total Potential To Emit (tons/year) | | | | | |
|-------------------------------------|----------------|------------------|-------------------------------|--------------------------|------------------|
| Pollutant | Storage Tanks | Loading Rack | Emissions Generating Activity | | TOTAL |
| | | | No. 2 Oil Combustion | Insignificant Activities | |
| PM | 0.00 | 0.00 | 0.14 | 3.56 | 3.70 |
| PM10 | 0.00 | 0.00 | 0.14 | 0.93 | 1.07 |
| SO2 | 0.00 | 0.00 | 2.72 | 0.00 | 2.72 |
| NOx | 0.00 | 0.00 | 1.37 | 0.00 | 1.37 |
| VOC | 15.26 | 1836.16 | 0.01 | 0.37 | 1851.80 |
| CO | 0.00 | 0.00 | 0.34 | 0.00 | 0.34 |
| total HAPs | 9.48 | 1345.45 | 0.00 | negl. | 1354.93 |
| worst case single HAP | 4.63 (Toluene) | 1015.69 (Xylene) | 0.00 | negl. | 1015.69 (Xylene) |

Total emissions based on rated capacities at 8,760 hours/year.

| Limited Potential To Emit (tons/year) | | | | | |
|---------------------------------------|---------------|--------------|-------------------------------|--------------------------|--------|
| Pollutant | Storage Tanks | Loading Rack | Emissions Generating Activity | | TOTAL |
| | | | No. 2 Oil Combustion | Insignificant Activities | |
| PM | 0.00 | 0.00 | 0.14 | 3.56 | 3.70 |
| PM10 | 0.00 | 0.00 | 0.14 | 0.93 | 1.07 |
| SO2 | 0.00 | 0.00 | 2.72 | 0.00 | 2.72 |
| NOx | 0.00 | 0.00 | 1.37 | 0.00 | 1.37 |
| VOC | 79.08 | 19.56 | 0.01 | 0.37 | 99.02 |
| CO | 0.00 | 0.00 | 0.34 | 0.00 | 0.34 |
| total HAPs | * | * | 0.00 | negl. | < 25.0 |
| worst case single HAP | * | * | 0.00 | negl. | < 10.0 |

Total emissions based on rated capacities at 8,760 hours/year.

* Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

**Appendix A: Emission Calculations
Tank VOC Emissions - Maximum PTE**

Company Name: Transmontaigne Terminaling, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
FESOP: F043-15196-00010
Reviewer: Adeel Yousuf / EVP
Date: August 6, 2002

| Tank ID | Product Stored | Losses (Tons per Year) | | | | | Total VOC Tons/yr |
|-----------|-------------------|------------------------|---------|----------|----------|--------------|-------------------|
| | | Breathing | Working | Withdraw | Rim Seal | Deck Fitting | |
| 1 | Xylene | -- | -- | 0.05 | 0.01 | 0.01 | 0.06 |
| 2 | Xylene | -- | -- | 0.05 | 0.01 | 0.01 | 0.06 |
| 3 | Xylene | -- | -- | 0.05 | 0.16 | 0.01 | 0.21 |
| 4 | Toluene | -- | -- | 0.05 | 0.51 | 0.04 | 0.60 |
| 5 | Hexane | -- | -- | 0.04 | 2.96 | 0.13 | 3.12 |
| 6 | Mineral Spirit | -- | -- | 0.03 | 0.02 | 0.02 | 0.07 |
| 7 | Xylene | -- | -- | 0.04 | 0.00 | 0.00 | 0.05 |
| 8 | Kwik Dri | -- | -- | 0.05 | 0.01 | 0.01 | 0.08 |
| 9 | VM&P Naptha | 0.473 | 4.429 | -- | -- | -- | 4.90 |
| 10 | Xylene | 0.205 | 1.042 | -- | -- | -- | 1.25 |
| 11 | Diesel | 0.040 | 0.190 | -- | -- | -- | 0.23 |
| 1C | Toluene | 0.024 | 0.148 | -- | -- | -- | 0.17 |
| 5C | Diesel | 0.012 | 0.073 | -- | -- | -- | 0.09 |
| 6C | Diesel | 0.014 | 0.073 | -- | -- | -- | 0.09 |
| 7C | Toluene | 0.522 | 2.663 | -- | -- | -- | 3.19 |
| 8C | Diesel | 0.021 | 0.150 | -- | -- | -- | 0.17 |
| A | Isopropyl Alcohol | 0.098 | 0.367 | -- | -- | -- | 0.47 |
| B | Isopropyl Alcohol | 0.098 | 0.367 | -- | -- | -- | 0.47 |
| Total VOC | | 1.51 | 9.50 | 0.35 | 3.68 | 0.22 | 15.26 |

Note: All storage tank emissions estimated using USEPA's Tanks 4.0 software program and are based on the estimated maximum annual throughput for each fuel/additive.

Appendix A: Emission Calculations Emissions from Truck Loading Operations

Company Name: Transmontaigne Terminaling, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
FESOP: F043-15196-00010
Reviewer: Adeel Yousuf / EVP
Date: August 6, 2002

Uncontrolled VOC Emissions

| Material Loaded | C Maximum Throughput kgal/yr | D Saturation Factor (S) | E MW lb/lb-mole | F Temperature F | G TVP psi | H AP-42 Emission Factor (lb/kgal) $12.46 \times D \times E \times G / (F + 460)$ | Maximum Uncontrolled Loading Losses (tons/yr) $C \times H / 2000$ |
|-------------------|---------------------------------------|-------------------------------|-----------------------|-----------------------|-----------------|---|--|
| Diesel | 40,320 | 1.45 | 130 | 56.00 | 0.7832 | 3.5649 | 71.87 |
| Xylene | 103,824 | 1.45 | 106 | 56.00 | 5.1400 | 19.1074 | 991.90 |
| Toluene | 45,360 | 1.45 | 92 | 56.00 | 0.7832 | 2.5264 | 57.30 |
| Hexane | 25,200 | 1.45 | 86 | 56.00 | 5.1400 | 15.5080 | 195.40 |
| Mineral Spirits | 18,144 | 1.45 | 142 | 56.00 | 5.1400 | 25.5557 | 231.84 |
| VMP Naptha | 14,112 | 1.45 | 123 | 56.00 | 0.7832 | 3.3730 | 23.80 |
| Isopropyl Alcohol | 2,880 | 0.60 | 60 | 56.00 | 5.1400 | 4.4749 | 6.44 |
| Kwik Dri | 20,160 | 1.45 | 142 | 56.00 | 5.1400 | 25.5557 | 257.60 |
| | 270,000 | | | | | | |
| Total | | | | | | | 1,836.16 |

Notes:

Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

Controlled/Limited VOC Emissions

| Material Loaded | Lim. VOC Emissions (tons/yr) |
|-------------------|------------------------------------|
| Diesel | 19.56 * |
| Xylene | |
| Toluene | |
| Hexane | |
| Mineral Spirits | |
| VMP Naptha | |
| Isopropyl Alcohol | |
| Kwik Dri | |
| Butane | |
| Total | 19.56 |

Notes:

VOC emissions from the loading rack are limited to 19.56 tons per year as approved in the original FESOP 043-5645-00010, issued on December 13, 1996. Monthly VOC emissions are calculated based on the following equation as listed in the original FESOP (043-5645-00010).

VOC (ton/month) = $\sum (i = 1; N) \{ 12.46 * Si * MWi * VPi / [Fi + 460] \} * [Ti / 2000] \leq 1.63$ (equivalent to 19.56 tons VOC per year)

Appendix A: Emission Calculations
Tank HAP Emissions - Maximum PTE

Company Name: Transmontaigne Terminals, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
Operating Permit No.: F043-15196-00010
Reviewer: Adeel Yousuf / EVP
Date: August 6, 2002

| Emission Source | Product Stored | VOC Emissions Tons/yr | Vapor Weight Percent | | | | | | Total |
|---------------------------|-----------------|-----------------------|----------------------|---------------|----------------|---------------|-------------|---------------|----------------|
| | | | Benzene | Toluene | Xylene | Ethyl Benzene | Cumene | Hexane | |
| | Diesel | N/A | 6.68% | 3.88% | 2.19% | 0.63% | 0.15% | 5.39% | |
| | Toluene | N/A | 0.00% | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | |
| | Xylene | N/A | 0.00% | 0.00% | 100.00% | 0.00% | 0.00% | 0.00% | |
| | Mineral Spirits | N/A | 0.00% | 13.00% | 4.00% | 0.00% | 0.00% | 0.00% | |
| | Hexane | N/A | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 100.00% | |
| | VMP Naptha | N/A | 0.00% | 13.00% | 4.00% | 0.00% | 0.00% | 0.00% | |
| | Kwik Dri | N/A | 0.00% | 13.00% | 4.00% | 0.00% | 0.00% | 0.00% | |
| HAP Emissions (tons/yr) | | | | | | | | | |
| Storage and Loading Racks | Diesel | 72.22 | 4.82 | 2.80 | 1.58 | 0.45 | 0.11 | 3.89 | 13.66 |
| | Toluene | 61.26 | 0.00 | 61.26 | 0.00 | 0.00 | 0.00 | 0.00 | 61.26 |
| | Xylene | 993.38 | 0.00 | 0.00 | 993.38 | 0.00 | 0.00 | 0.00 | 993.38 |
| | Mineral Spirits | 231.91 | 0.00 | 30.15 | 9.28 | 0.00 | 0.00 | 0.00 | 39.42 |
| | Hexane | 198.52 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 198.52 | 198.52 |
| | VMP Naptha | 28.70 | 0.00 | 3.73 | 1.15 | 0.00 | 0.00 | 0.00 | 4.88 |
| | Kwik Dri | 257.68 | 0.00 | 33.50 | 10.31 | 0.00 | 0.00 | 0.00 | 43.81 |
| Total | | 1843.67 | 4.82 | 131.44 | 1015.69 | 0.45 | 0.11 | 202.41 | 1354.93 |

Single HAP and total HAPs shall be limited to 10 and 25 tons per year, respectively. Therefore, the requirements fo 326 IAC 2-7 do not apply.

Note: All storage tank emissions estimated using USEPA's Tanks 4.0 software program and are based on the estimated maximum annual throughput for each tank.

Appendix A: Emission Calculations Process Fugitive

Company Name: Transmontaigne Terminaling, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
FESOP: F043-15196-00010
Reviewer: Adeel Yousuf / EVP
Date: August 6, 2002

| Component Type | Service | No. of Components | Avg. Emission Factor (lb/hr/comp) | VOC Emissions (lb/hr) | VOC Emissions (tpy) |
|--------------------------------|--------------|-------------------|-----------------------------------|-----------------------|---------------------|
| Fittings (connectors, flanges) | Light Liquid | 672 | 1.76E-05 | 0.012 | 0.05 |
| Pump Seals | Light Liquid | 16 | 1.19E-03 | 0.019 | 0.08 |
| Valves | Light Liquid | 153 | 9.48E-05 | 0.015 | 0.06 |
| TOTAL | | 853 | | 0.05 | 0.20 |

Notes:

Emission factors are based on Fugitive Emissions From Equipment Leaks II: • Calculation Procedures for Petroleum Industry Facilities
API Publication No. 343, May 1998.

Methodology:

VOC Emssions (tpy) = Quantiy x Emission Factor x (1 ton/ 2000 lb) x (8760 hr / 1 yr)

Appendix A: Potential Emissions Calculations
No. 2 Fuel Oil Combustion Only
MM BTU/HR < 100
Boiler EU-24

Company Name: Transmontaigne Terminaling, Inc.
Address City IN Zip: 20 Jackson St., New Albany, Indiana
FESOP Renewal No.: F043-15196-00010
Pit ID: Adeel Yousuf / EVP
Reviewer: August 6, 2002

| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr | kgals/year | S = Weight % Sulfur Limited |
|---------------------------------|---------------------------------|------------|--------------------------------|
| 2.19 | 19.2 | 136.9 | 0.28 |

Heat Input Capacity includes:

One distillate oil fired boiler with maximum heat input capacity of 2.188 MMBtu/hr (Insignificant Activity)

| | Pollutant | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|-------------|
| | PM | PM 10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/kgal (No. 2 fuel oil combustion) | 2.0 | 2.0 | 142S | 20.00 | 0.2 | 5.0 |
| Potential Emissions burning No. 2 fuel oil, tons/yr | 0.14 | 0.14 | 2.72 | 1.37 | 0.01 | 0.34 |

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for CO from natural gas combustion: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors for natural gas combustion are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emissions from natural gas combustion (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors for No. 2 fuel oil combustion are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emissions from No. 2 fuel oil combustion (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Compliance with 326 IAC 7-1.1-2

The following calculations determine the maximum sulfur content of #2 distillate fuel allowed by 326 IAC 7-1-.1-2:

| | | | |
|-----------------|---------|---------------|----------------|
| 0.5 lb/MMBtu x | 140,000 | Btu/gal = | 70 lb/1000 gal |
| 70 lb/1000 gal/ | 142 | lb/1000 gal = | 0.50 % |

Sulfur content must be less than or equal to 0.50 % to comply with 326 IAC 7-1.1-2.

FESOP No. F043-5645-00010, issued 12/13/96, limits #2 fuel oil sulfur content to: 0.28 %

Facility will comply with 326 IAC 7-1.1-2 by using fuel oil with a limited 0.28% sulfur content.

Company Name:
Plant Location:
County:
Date Received:
Permit Reviewer:

Transmontaigne Terminating, Inc.
New Albany, Indiana
Floyd
January 8, 2002
Adeel Yousuf/EVP

**** unpaved roads ****

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2.2

I. Semi Dump Trucks

$$8 \text{ trip/hr} \times 0.015 \text{ mile/trip} \times 2 \text{ (round trip)} \times 8,760 \text{ hr/yr} = 2,102 \text{ mile/yr}$$

$$E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b] / [(M_{dry}/0.2)^c] \cdot [(365-p)/365] \cdot (S/15)$$

$$= 3.39 \text{ lb PM/mile}$$

$$= 0.88 \text{ lb PM}_{10}/\text{mile}$$

where k = 10 (particle size multiplier, PM₃₀) (k = 2.6 for PM₁₀)
s = 4.8 mean % silt content of unpaved plant roads
a = 0.8 Constant for PM₃₀/PM₁₀
W = 31 tons, average vehicle weight
b = 0.5 Constant for PM₃₀ (b = 0.4 for PM₁₀)
M_{dry} = 0.2 surface material moisture content, % (default 0.2 (dry conditions) when using rainfall parameter)
c = 0.4 Constant for PM₃₀ (c = 0.3 for PM₁₀)
p = 125 number of days with at least 0.01 in of precipitation per year
S = 5 mph speed limit

$$\text{PM:} \quad \frac{3.39 \text{ lb/mi} \times 2,102 \text{ mi/yr}}{2000 \text{ lb/ton}} = 3.56 \text{ tons/yr}$$

$$\text{PM}_{10}: \quad \frac{0.88 \text{ lb/mi} \times 2,102 \text{ mi/yr}}{2000 \text{ lb/ton}} = 0.93 \text{ tons/yr}$$